BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Kansas City Power & Light)	
Company's Request for Authority to Implement)	Case No.ER-2014-0370
A General Rate Increase for Electric Service)	

KANSAS CITY POWER & LIGHT COMPANY'S MOTION FOR EXPEDITED CONSIDERATION AND APPROVAL OF TARIFF SHEETS FILED IN COMPLIANCE WITH COMMISSION'S REPORT AND ORDER ON LESS THAN THIRTY DAYS' NOTICE

COMES NOW Kansas City Power & Light Company ("KCP&L"), pursuant to the Commission's Report and Order in the above-captioned case issued September 2, 2015 (the "Report and Order") and 4 CSR 240-2.080(14), hereby files its Motion for Expedited Consideration and Approval of Tariff Sheets Filed in Compliance with Commission Report and Order on Less Than Thirty Days' Notice ("Motion"). In support of its Motion, KCP&L states as follows:

- 1. On September 2, 2015, the Commission issued its Report and Order in this proceeding, to become effective on September 15, 2015. Among other things, the Report and Order authorizes KCP&L to file tariffs complying with the Report and Order and directs KCP&L to do so by September 8, 2015.
- 2. KCP&L filed with the Commission revised tariff sheets as authorized by the Report and Order to effectuate the decisions made by the Commission in the Report and Order. Those revised tariff sheet bear an issue date of September 8, 2015, with an effective date thirty days later in order to comply with 4 CSR 240-3.145.¹

¹ KCP&L has complied with this Commission rule by filing the compliance tariffs with a thirty day effective date, despite its belief that thirty days' notice is unnecessary under these circumstances, particularly given the specific provisions of Section 393.140(11), discussed below. Unless otherwise indicated, all statutory references are to the Missouri Revised Statutes (2000), as amended.

- 3. Section 393.140(11) specifies that, unless the Commission orders otherwise, a change shall not be made to any rate filed by an electrical corporation except after thirty days' notice to the Commission and publication for thirty days as required by order of the Commission. However, Section 393.140(11) expressly provides that, for good cause shown, the Commission may allow tariff changes without requiring thirty days' notice. Good cause exists to make KCP&L's compliance tariffs effective on or before the operation of law date in this case because the Commission has already found that KCP&L is presently in a revenue deficient position of approximately \$245,000 per day on average, and the Commission has already authorized and directed KCP&L to file the tariffs that are filed concurrently with the filing of this Motion.
- 4. As provided in 4 CSR 240-2.080(14), KCP&L requests that the Commission approve the compliance tariffs effective September 15, 2015² or as soon as possible thereafter and in any event, no later than September 29, 2015, the operation of law date in this case. The Commission, as noted earlier, has good cause to do so. Furthermore, KCP&L states that by doing so, the Commission will avoid the harm that would be caused by any delay in allowing rates determined to have been just and reasonable to take effect. Moreover, there can be no negative effect on anyone ratepayers or KCP&L if the compliance tariffs are approved to be effective September 29, 2015 or earlier if possible because this will allow the rates determined by the Commission to be just and reasonable rates to in fact be charged for the electric service provided by KCP&L.
 - 5. This Motion was filed as soon as it could have been under the circumstances.

² KCP&L acknowledges <u>State ex rel. OPC v. PSC</u>, 409 S.W.3d 522 (Mo.App. 2013) and assumes Commission compliance therewith.

2

WHEREFORE, for the foregoing reasons and for good cause shown, KCP&L respectfully requests that the Commission grant this Motion, and approve the tariff sheets KCP&L has filed to be effective for service rendered on and after September 15, 2015 or as soon as possible thereafter but in any event no later than September 29, 2015.

Respectfully submitted,

|s| Roger W. Steiner

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Attorney for Kansas City Power & Light Company

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 8^{th} day of September, 2015.

|s| Roger W. Steiner

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